

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROSE FAVARD,

Plaintiff,

vs.

LIFE CARE CENTERS OF AMERICA, INC.,¹

Defendant.

Civil Action No. 04-cv-11893 NG

DEFENDANT'S LOCAL RULE 16.1 CERTIFICATION

Defendant, Life Care Centers of America, Inc., and the undersigned counsel, in accordance with Rule 16.1(D)(3) of the Local Rules of the United States District Court for the District of Massachusetts, hereby certify that they have conferred:

- a) with a view to establishing a budget for the cost of conducting the full course -- and various alternative courses -- of this litigation; and
- b) to consider the resolution of this case through the use of alternative dispute resolution programs, such as those outlined in Local Rule 16.4.

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¹ Defendant has been improperly named in this case as "Life Care Centers of America, Inc. d/b/a Life Care Center of Stoneham." In fact, Stoneham Medical Investors LP, whose general and limited partners are a Tennessee corporation and a Tennessee resident, is the entity doing business as Life Care Center of Stoneham, which issues paychecks to the individuals employed at the Life Care Center of Stoneham.